

**AMENDMENTS TO THE DRAWINGS**

Please amend the figures as shown in the enclosed replacement sheets. The attached sheets of drawings include changes to Figures 1, 2A, 2B, and 2C. Each figure was amended to include "Prior Art" in the title of the figure. No new matter has been added.

**REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

**Disposition of Claims**

Claims 1-30 are pending in this application. Claims 1, 10, 20, and 23 are independent. The remaining claims depend, directly or indirectly, from claims 1, 10, 20, and 23.

**Rejections under 35 U.S.C. § 102****U.S. Patent No. 4,646,825**

Claims 1-8, 10-12, 14-27, 29, and 30 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,646,825 (“Van Winkle”). Claims 1, 10, 20, and 23 have been amended to clarify the present invention. To the extent that the Examiner maintains the rejection to the amended claims, the rejection is respectfully traversed.

Of the rejected claims, amended claims 1, 10, 20, and 23 are independent. Amended claim 1 recites a fastener for coupling blowout preventers “BOPs” in a stack. The fastener comprises an elongated shaft having a first end and a second end. A head is disposed proximate the first end of the elongated shaft, and is adapted to be retained in a connecting face of a first BOP. The second end of the elongated shaft is adapted to be coupled to a second BOP, wherein the second BOP is adjacent to the first BOP. Amended claim 10 recites a coupled BOP stack, which uses a fastener according to amended claim 1. Amended claim 20 recites a method for coupling two BOPs in a BOP stack, which also uses a fastener according to amended claim 1. Amended claim 23 recites a different form of fastener for coupling BOPs in a stack. The fastener of amended claim 23 comprises a first member having a first head adapted to be

retained in a recess of the first BOP and a second member adapted to be coupled to a second BOP, wherein the first BOP is adjacent to the second BOP. The first member and the second member of the fastener in amended claim 23 are further configured to be coupled to each other.

Van Winkle only discloses a single ram-type BOP, and is silent on any fasteners for coupling two BOPs. With reference to Figure 7, Applicant respectfully notes that the fastener to which the Examiner refers is *not* coupling two BOPs, nor is it adapted to do so. Instead, the fastener is used for connecting the shear blades 40 and 41 to annular ram bodies 13 and 14, respectively (column 3, line 62). Annular ram bodies 13 and 14 are components of a *single* BOP, not a coupling of two BOPs. Accordingly, Van Winkle, and any fasteners disclosed therein, cannot be said to anticipate amended claims 1 or 23. Further, because Van Winkle is silent on the stacking of BOPs, Van Winkle cannot be said to anticipate amended claims 10 or 20, each of which relate to the stacking of BOPs.

In view of the above, Van Winkle fails to show or suggest the present invention as recited in amended independent claims 1, 10, 20, and 23. Thus, amended claims 1, 10, 20, and 23 are patentable over Van Winkle. Dependent claims are allowable for at least the same reasons. Accordingly, withdrawal of these rejections if respectfully requested.

U.S. Patent No. 4,580,628

Claims 1, 2, 4, 7, 8, 10, 12, 17-19, 23, 24, and 27 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,580,628 (“Schaeper”). Claims 1, 10, 20, and 23 have been amended to clarify the present invention. To the extent that the Examiner maintains the rejection to the amended claims, the rejection is respectfully traversed.

With reference to Figure 1, Schaeper shows a BOP stack 10 including an upper annular BOP 12, a plurality of ram type BOPs 14, a remote connecting means 16 (shown as a collet connector), and tie rods 18 to secure the all of the individual components of the stack together in a tight sealed relationship (beginning at column 3, line 22). Schaeper neither shows nor suggests the BOP stack of the present invention. As recited in amended claim 1, the BOPs of the BOP stack are coupled to each other, in which each BOP member is *separately* secured to each adjacent BOP member, not in one tight sealed relationship as disclosed by Schaeper (column 3, line 26-28).

Further, the Examiner refers to a head 26 adapted to be retained in a recess 28 in a first blowout preventer 14 as shown by Schaeper. The head 26 is not retained in a recess 28 in a *connecting face* of a first blowout preventer, as recited in amended claims 1 and 10. As defined in the present application on page 7, paragraph [0037], a “connecting face” is the face of the BOP that faces another BOP to which the first BOP is coupled. As shown in Figure 3 of Schaeper, Schaeper shows the means 20 for securing the upper ends of the tie rods 18 to the upper annular BOP body 13, in which the tie rods 18 are screwed down between a recess 28 and a plate *on the side* of the annular BOP body 13 (beginning at column 3, line 31).

Next, Schaeper neither shows nor suggests a second end of the fastener being adapted to be coupled to a second BOP, as recited in amended claim 1, 10, 20, and 23. In Figure 3 of the application, the second end of the fastener is engaged with the lower BOP (beginning in page 7, paragraph [0037]). Shown in Figure 1 and Figure 4 of Schaeper, the lower end 49 of the tie rods 18 are engaged with the test stump 38 at the bottom of the stack (beginning at column 3, line 60), not engaged with another BOP.

In view of the above, Schaeper fails to show or suggest the present invention as recited in amended claims 1, 10, 20, and 23. Thus, amended claims 1, 10, 20, and 23 are patentable over Schaeper. Dependent claims are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully traversed.

#### **Rejections under 35 U.S.C. § 103**

Claims 8, 13, and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Van Winkle or Schaeper alone. This rejection is respectfully traversed.

As discussed above with respect to amended claims 1, 10, 20, and 23, from which claims 8, 13, and 28 depend, neither Van Winkle nor Schaeper show or suggest a fastener for coupling BOPs in a stack as recited in amended claims 1, 10, 20, and 23.

In view of the above, Van Winkle and Schaeper fail to show or suggest the present invention as recited in amended claims 1, 10, 20, and 23. Thus, amended claims 1, 10, 20, and 23 are patentable over Van Winkle and Schaeper. Claims 8, 13, and 28, which depend from amended claims 1, 10, 20, and 23, are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

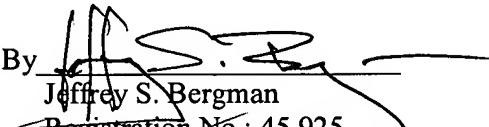
#### **Conclusions**

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 09430/267001).

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Respectfully submitted,

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